

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re: CAROL W. NEWKIRK

Index No. 10 - 15261 (BRL)

Debtor.

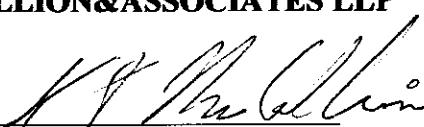
**NOTICE OF MOTION TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFF**

PLEASE TAKE NOTICE, that upon the annexed affirmation of Kenneth F. McCallion, Esq. individually and on behalf of McCallion & Associates LLP, and upon all prior proceedings herein, counsel will move this Court before the Honorable Burton R. Lifland, United States Bankruptcy Judge for the Southern District of New York, on the 22<sup>nd</sup> day of December, 2010, at 9:30 o'clock in the forenoon of that day or as soon thereafter as counsel may be heard for:

1. An Order allowing the undersigned to withdraw as counsel of record for Debtor CAROL W. NEWKIRK, pursuant to Local Rule 1.4 and Model Rules of Professional Conduct Rule 1.16;
2. An Order granting CAROL W. NEWKIRK thirty (30) days to retain new counsel; and,
3. Such other and further relief as to the Court deems just and proper.

Dated: New York, New York  
November 29, 2010

McCALLION & ASSOCIATES LLP

By: 

Kenneth F. McCallion  
Attorneys for Debtor  
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